

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

PATRICIA CUMMINGS,

Plaintiff,

- against -

THE CITY OF NEW YORK, *et al.*,

Defendants.

Index No.: 19-CV-1664-SJF

**DECLARATION OF RICHARD D. ROCHFORD**

RICHARD D. ROCHFORD, hereby declares pursuant to 28 U.S.C. § 1746:

1. I am a member of Haynes and Boone, LLP, attorneys for defendants Hechinger Institute on Education and the Media, an institute of Teachers College, Columbia University and Dr. Andre Perry (collectively, the “Hechinger Defendants”), and admitted to practice in this Court. I submit this declaration to provide the Court with a document in support of the Hechinger Defendants’ motion to dismiss the Complaint in its entirety.

2. Attached hereto as Exhibit A is a true and correct copy of a column in the Hechinger Report, dated February 6, 2018, titled “Teachers, how does it feel to be oppressors?” which is referenced in the Complaint (Doc. No. 13) ¶ 119 n. 9, and which is available at <https://hechingerreport.org/teachers-feel-oppressor/> (last visited June 26, 2019).

I declare, under penalty of perjury, that the foregoing is true and correct.

Dated: June 28, 2019

s/Richard D. Rochford  
Richard D. Rochford